

MCIWORLD.COM

EX PARTE OR LATE FILED

ORIGINAL

1801 Pennsylvania Avenue, NW
Washington, DC 20006

ORIGINAL

July 23, 1999

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

JUL 23 1999

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

CC Docket Nos. 99-200/96-98; NSD Nos. L 97-42; 99-33; 99-27; 98-136; 99-55; 99-21;
99-19

Dear Ms. Salas:

On July 23, 1999, Mary DeLuca, Hank Hultquist, Jim Joerger, Cindy Brown, and I of MCI WorldCom met with Blaise Scinto, Tejal Mehta, and Jared Carlson of the Common Carrier Bureau's Network Services Division. As described in the attached documents distributed at the meeting, we discussed the petitions filed by several states requesting additional delegated authority to implement number conservation measures. MCI WorldCom explained ways that the FCC could grant states additional authority without harming uniform number administration and provided an interim pooling proposal.

In accordance with section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), an original and nine copies is being filed with your office.

Sincerely,



Lori Wright
Senior Manager
Regulatory Affairs

cc: Anna Gomez
Blaise Scinto
Tejal Mehta
Jared Carlson

No. of Copies rec'd 079
List A B C D E

State Numbering Petitions

MCI WorldCom, Inc

July 22, 1999

CC Docket No. 99-200, 96-98

NSD Nos. L: -97-42(PA), -99-33 (FL), -99-
27(ME), -98-136 (CA), -99-55(TX), -99-21 (NY),
-99-19 (MA)

State Numbering Petitions

- Grant states additional authority that does not harm uniform number administration.
- MCI interim pooling proposal.
- NPAC Version 1.4 works only as a limited experiment.
- Some authority sought by states will not slow NPA exhaust.

Grant States Additional Authority That Does Not Harm Uniform Number Administration

- Order Inter-Provider UNP (MCIW Phase 1);
- Work w/NANPA to verify only certified carriers obtain initial codes and to reclaim invalid-assigned NXX codes;
- Require growth code requests include showing of need;
- Require sequential numbering(except for specific customers);
- Hear & address number requests outside of lotteries;
- Obtain data from all code holders;
- Implement pooling w/new NXXs & clean 1K blocks w/NPAC Release 3.0.

MCI WorldCom Interim Pooling Proposal

- **Allow states to implement pools with new assignments and clean 1K blocks when Version 3.0 is available in mid-2000:**
 - Y2K “Quiet Period” will not permit pools to be established in 1999;
 - Version 1.4 pooling threatens network reliability;
 - Satisfies states’ needs to slow down NPA Exhaust;
 - Does not decide competitive issues associated with “contamination” in NRO Docket;
 - Also retrieves “clean” blocks and 1K assignments for lotteries.

NPAC Version 1.4 Works Only As a Limited Experiment

- **Ver 1.4 not designed for nationwide implementation:**
 - Only designed to test one NPA (IL 847);
 - Manual process overburdens carriers.
- **Ver 1.4 creates too many data records/NXX to manage effectively on a large scale;**
 - Exceeds carrier's SCP capacity design.
- **Ver 1.4 too risky to service quality when converting to Version 3.0.**
- **With Y2K “quiet period”: Implementation of Version 1.4, 2Q00, Version 3.0 2H00 (tentative).**

1.4 + Conversion vs. 3.0 EDR

	<u>3.0 EDR</u>		<u>Current 1.4</u>	<u>Data</u>	<u>Conversion</u>
	<u>No Contam</u>	<u>10% Contam</u>		Delete/Add	Remain (3.0)
1 Block	1 Record	101 Records	1000 Records	900-1000/ 1	1-101
847 Actuals 250/132	Looks w/	Actual contam 382	250,000	249,868/ 250	382
847-like w/unknown contam. 36 NPAs at 250 blks.	250	25,250	250,000	225,000-250,000/ 250	250-25,250
	9,000	909,000	9 M	8.1 M-9 M/ 9,000	9,000-909,000
46 NPAs at 250 blks.	11,500	1,161,500	11.5 M	10.35 M-11.5 M/ 11,500	11,500- 1,161,500

Some Authority Sought by States Will Not Slow NPA Exhaust

- **Footprint demand is major driver of NPA Exhaust, measures that don't reduce footprint demand will have negligible effect on exhaust:**
 - Fill rates only affect growth codes (very few for CLECs);
 - Administrative measures will eliminate only a small number of code requests.
- **Technology-Specific Overlays do not save NXX codes**
 - hurts number porting between wireline and wireless;
 - New York Wireless overlay no longer reserved for one wireless.

Summary

- Limit extent of authority given to states.
- Allow authority until Commission decides national pooling framework.
- Focus on results that reduce the footprint demand.
- Do not move pooling forward with NPAC software, Version 1.4.